Electronic Visit Verification Project
Stakeholder Update

February 11, 2020

Alexandra Fernández
Bureau Chief, Bureau of Long Term Care

IDAHO DEPARTMENT OF
HEALTH & WELFARE

- ➢ EVV Refresher

- ➢ Implementation Update

- ➢ Follow-Up on Residential Habilitation Services

- ➢ Stakeholder Workgroup Updates

- ➢ Parking Lot

- ➢ Next Steps

- ➢ A system that captures information about a visit to a participant's home

- ➢ There are many types of EVV systems available:

  - ➢ Telephony (Interactive voice response)

  - ➢ GPS-enabled

  - ➢ Smart phone-based applications

- ➢ The Electronic Visit Verification (EVV) mandate is in the 21st Century CURES Act

- ➢ Section 12006 requires states to implement an EVV system:

  - ➢ For Personal Care Services (PCS) by January 1, 2020

  - ➢ For Home Health Services by January 1, 2023

- ➢ Fiscal penalties will be imposed on the state for non-compliance*

States have an opportunity to request a waiver of the penalty for the first year of implementation. Our Good Faith Effort (waiver) was approved on November 5, 2019, delaying implementation for PCS to January 1, 2021.

Project Phase II – Determine and Implement Idaho's EVV Model

Winter 2019/2020

- Work with stakeholders to plan implementation of chosen EVV model.
- Begin working on changes to Idaho Administrative Code (IDAPA).
- Initiate requirements gathering for state aggregator.

Spring/Summer 2020

- Initiate EVV launch – state aggregator and provider adoption of EVV compliant systems.
- Complete training for relevant stakeholder groups.
- Temporary rules go live July 1, 2020.

➢ **Idaho has selected an Open Model**

Open Model

- Providers can use any EVV software they choose that meets the minimum requirements and is compatible with the state's aggregator.
- The state must identify how to aggregate and use data from those systems.

➢ **The Open Model has been approved by Medicaid Administration with controls in place to ensure compatibility with the state's aggregator**

   ➢ **Example: Provision requiring successful data transmission to aggregator to be considered compliant**

➢ **These criteria will be proposed as part of the Rules Workgroup**

➢ Idaho will use Sandata as the state's aggregator, pending legislative budget approval

➢ Sandata is DXC Technology's aggregator solution

➢ EVV is within the scope of DHW's existing contract with DXC Technology, meaning no Request for Proposal is required

➢ The EVV budget requests were presented to the Joint Finance-Appropriations Committee (JFAC) on Monday, February 10

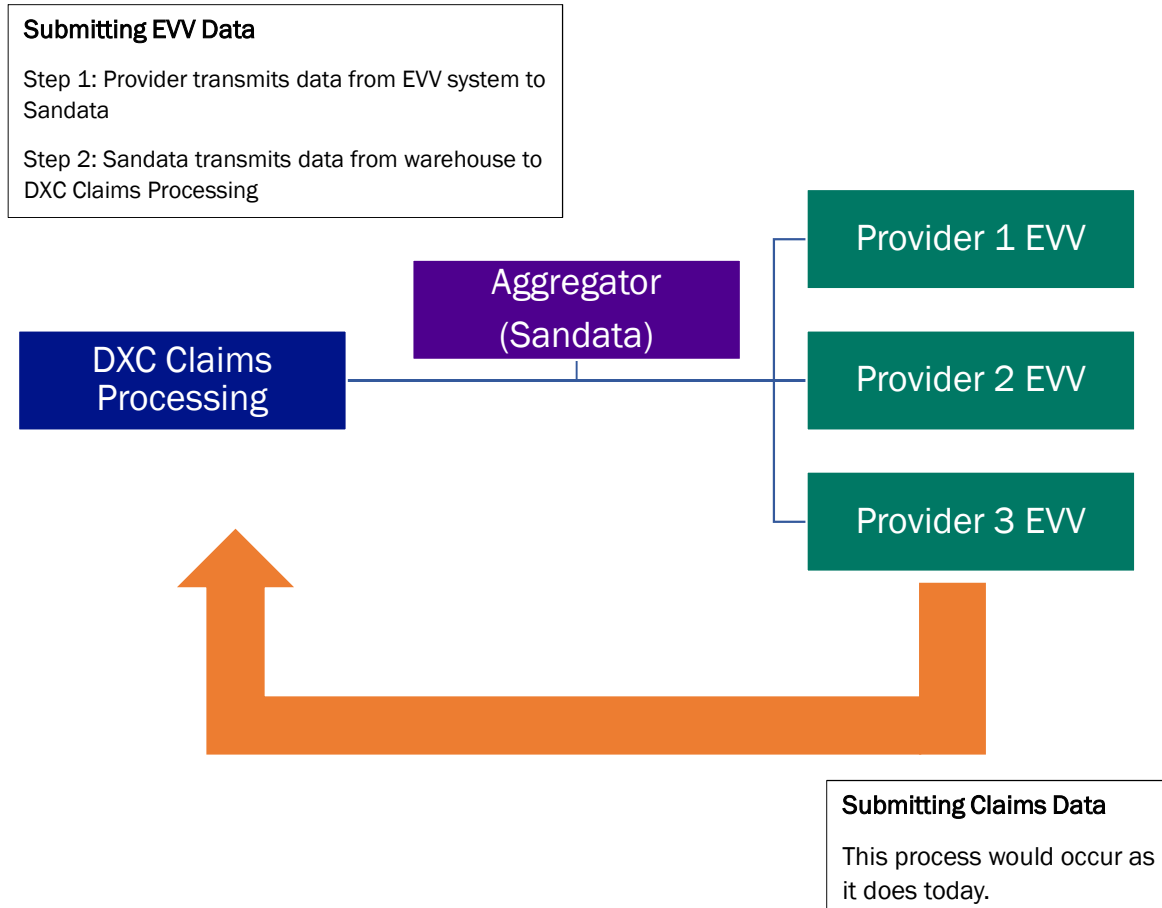➢ The budget request includes two lines items: 1) aggregator, 2) rate increase for Personal Assistance Agencies

➢ The EVV Project Team determined Residential Habilitation was out of scope based on the service definition in Idaho and requested confirmation from the Centers for Medicare and Medicaid Services (CMS)

➢ The team had a technical assistance call with CMS on December 18, 2019

  ➢ CMS indicated that if 20% or more of a service unit is spent providing assistance with Activities of Daily Living (ADLs), then the service would be subject to EVV

  ➢ We are completing a more in-depth analysis of hourly Residential Habilitation services to determine if this threshold is met or not

  ➢ The Project Team will make this analysis available once complete and approved by Medicaid Administration

- An aggregator is a system that collects, validates and stores statewide EVV visit data

- The aggregator transmits the provider's EVV data to the Medicaid Management Information System (MMIS), the state's claims processing system

Submitting EVV Data

Step 1: Provider transmits data from EVV system to Sandata

Step 2: Sandata transmits data from warehouse to DXC Claims Processing

Provider 1 EVV

Aggregator (Sandata)

DXC Claims Processing

Provider 2 EVV

Provider 3 EVV

Submitting Claims Data

This process would occur as it does today.

➢ **The Policy & Operations Workgroup and Implementation Workgroup have been consolidated**

  ➢ **The group includes Personal Assistance Agencies, Home Health Agencies, participants, Centers for Independent Living, and advocacy entities**

EVV Advisory Group ➤ Rules

Why?

• **Cross-over work: Increase efficiency**

• **Time: To be mindful of group member's schedules and project timeline**

Completed Items

- Frequently Asked Questions are posted on the webpage under the Resources header!
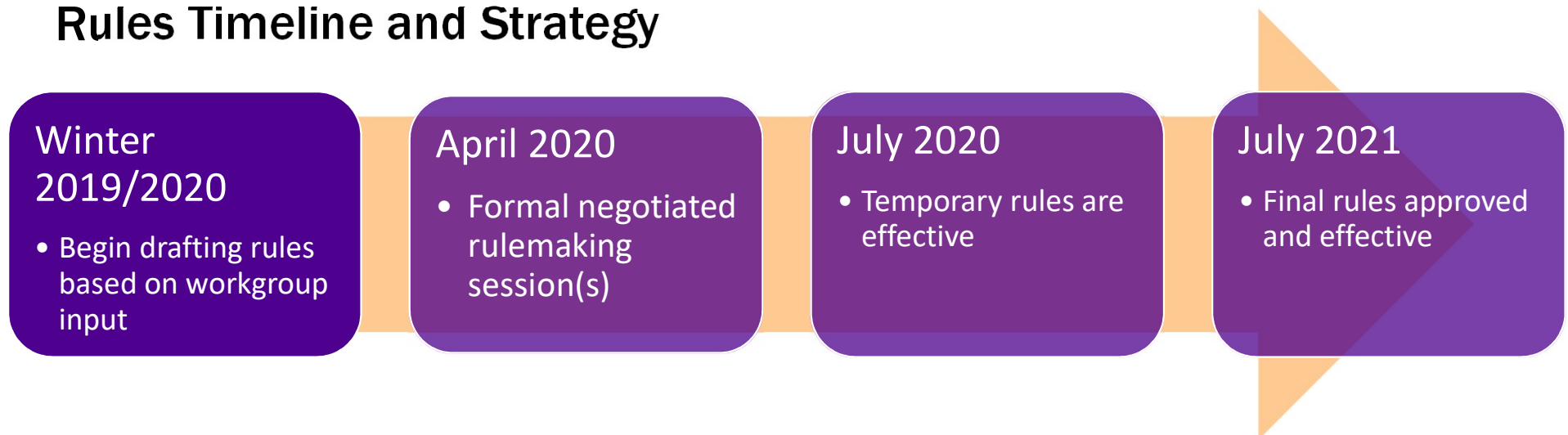
Pending Items

- A draft of the Provider Best Practice Guidance Document is posted on the webpage under the Resources header for comment!

Upcoming

- Drafting a Participant Best Practice Guidance Document
- Finalizing minimum requirements for EVV systems
- Identifying implementation phases and a timeline

Rules Timeline and Strategy

Winter 2019/2020
- Begin drafting rules based on workgroup input

April 2020
- Formal negotiated rulemaking session(s)

July 2020
- Temporary rules are effective

July 2021
- Final rules approved and effective

➤By writing in an implementation time frame, we can provide a phase-in period for providers and Medicaid to implement. Example: IDAPA 16.03.10.318.03:

03. **Quality Assurance.** The Department will begin enforcement of quality assurance compliance with Sections 311 through 314 of these rules on January 1, 2017. (7-1-16)

➢ Products from the advisory group will be presented to this larger stakeholder group for comment

➢ All recommendations will be considered and reviewed by the project team and Medicaid Administration for final approval

➢ Work deliverables will be made available to all EVV stakeholders for further comment before adopting in final

  ➢ Posted on the EVV web page

  ➢ Distributed via email blast

  ➢ Reviewed during stakeholder updates

Update! The Bureau of Long Term Care (BLTC) has scheduled a rule review session for PAA providers

➢ PAA providers have an opportunity to participate in a separate workgroup to review Service Plan and Progress Note rules and the impact of EVV

➢ This will be hosted by the BLTC QA Manager and is specific to Personal Care Service and Aged & Disabled Waiver Service IDAPA rules

Scheduled: February 25, 2020 from 10 – 11:30AM MT via WebEx

➤ The Project Team is soliciting participation on each of the workgroups by individuals accessing EVV-applicable services to ensure that all aspects of the user perspective are captured

➤ We may have additional opportunities for participant engagement as the project develops

- ➤ The Project Team has developed an issue "Parking Lot"

- ➤ What is included in the Parking Lot?

  - ➤ Questions pending response

  - ➤ Questions or policy considerations dependent upon other milestone decisions

  - ➤ Topics out of scope of the EVV Project

- ➤ Some of the items in the Parking Lot may not be actionable by the EVV Project Team

- ➤ Distribute workgroup deliverables for review and comment
- ➤ Initiate Rules Workgroup
- ➤ Internal work:
  - ➤ Engaging with our systems team
  - ➤ Engaging with DXC Technology
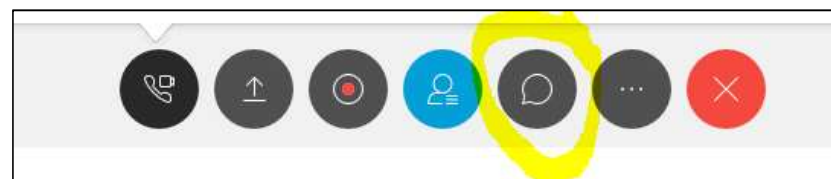- ➤ Next stakeholder update: April

WHAT'S NEXT?

Stay Up-To-Date!

➤ Visit http://EVV.dhw.Idaho.gov for more information about the

project and upcoming activities

➤ Email the project team at EVV@dhw.Idaho.gov

Ask a question using the "chat" feature in the WebEx Application.

You can also ask your question by pressing *6 to un-mute your phone.